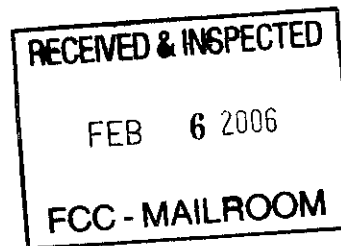


February 2, 2006

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554



Paul Bunyan Telephone

COOPERATIVE HEADQUARTERS

1831 ANNE STREET NW

BEMIDJI, MN 56601-5612

PHONE 218,444-1244

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WWW.PAULBUNYAN.NET

**Re: EB Docket No. 06-36 and EB Docket No. 06-36,
Certification of CPNI Filing 2006**

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2006", as ordered in EB-06-TC-060, in addition to Docket No. 06-36.

**Paul Bunyan Rural Telephone Cooperative
1831 Anne St NW
Bemidji, MN 56601**

As a corporate officer of these companies, I hereby certify that, based on my personal knowledge, the Companies have established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

The attached Statement demonstrates such compliance.


Chief Executive Officer

Dated: February 2, 2006

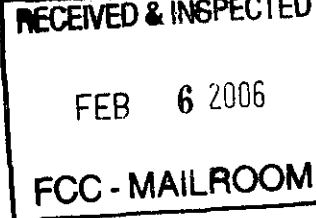
Attachment

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement
Bureau, Federal Communications Commission, Room 4-A234, 445 12th Street,
SW, Washington, DC 20554

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CPNI Operating Procedure Statement

Paul Bunyan Rural Telephone Cooperative is in compliance with the FCC's CPNI rules due to the fact that our company does not use CPNI in its *marketing efforts*, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

Our company trains its personnel to this effect and state that we do not authorize the use of CPNI, and we have an express disciplinary process in place if these rules are violated.